STEVEN K. EISENBERG, ESQUIRE (75736)
M. TROY FREEDMAN, ESQUIRE (85165)
LESLIE J. RASE, ESQUIRE (58365)
LEN M. GARZA, ESQUIRE (310577)
CHRISTINA C. VIOLA, ESQUIRE (308909)
ANDREW J. MARLEY, ESQUIRE (312314)
STERN & EISENBERG, PC
1581 MAIN STREET, SUITE 200
WARRINGTON, PENNSYLVANIA 18976
TELEPHONE: (215) 572-8111
FACSIMILE: (215) 572-5025
(COUNSEL FOR MOVANT)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

Christopher W. Bainbridge and Kelly J. Bainbridge Debtor(s)

U.S. Bank National Association, as Trustee for the C-BASS Mortgage Loan Asset-Backed Certificates, Series 2007-CB6, by its attorney in fact Ocwen Loan Servicing, LLC.

v.

Christopher W. Bainbridge and Kelly J. Bainbridge Debtor(s) Chapter 13

Bankruptcy Case: 10-09019

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. Bank National Association, as Trustee for the C-BASS Mortgage Loan Asset-Backed Certificates, Series 2007-CB6, by its attorney in fact Ocwen Loan Servicing, LLC. has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362 (d) (and §1301) in order to proceed with its rights under non-bankruptcy law with regard to the Property: **25** 5th Street, Hawley, **PA**.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before Monday, August 5, 2013 you or your attorney must do <u>all</u> of the following:
 - (a) file an answer explaining your position with the Clerk of the Bankruptcy Court.

MFR CH 13

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before that date stated above; and

(b) mail a copy to movant's attorney:

Stern & Eisenberg PC The Pavilion 261 Old York Road, Suite 410 Jenkintown, PA 19046 Phone: (215) 572-8111 FAX: (215) 572-5025

and to the Trustee:

Charles J. DeHart. III 8125 Adams Drive #A Hummelstown, PA 17036

And to all other parties to which service must be provided under the Bankruptcy Rules.

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Robert N. Opel II on Wednesday, August 7, 2013 at 9:30 AM in Courtroom 2, 197 S. Main Street, United States Bankruptcy Court, Wilkes Barre, PA 18701.

STERN & EISENBERG PC

BY: /s/Leslie J. Rase, Esquire ☐ STEVEN K. EISENBERG, ESQUIRE ☐ M. TROY FREEDMAN, ESQUIRE ☐ LESLIE J. RASE, ESQUIRE LRase@sterneisenberg.com Stern & Eisenberg, PC 1581 Main Street, Suite 200 Warrington, Pennsylvania 18976 (215) 572-8111 Fax: (215) 572-5025

Counsel for Movant

DATE: 07/18/2013

MFR CH 13